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for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff,

Plaintiff,

v.

LION GLOBAL INVESTORS LIMITED,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 11-02540 (CGM)

**CERTIFICATE OF NO OBJECTION TO TRUSTEE'S
MOTIONS FOR ISSUANCE OF LETTERS OF REQUEST**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investors Protection Act 15 U.S.C. §§ 78aaa-III, and the substantively consolidated chapter 7 estate of Bernard L. Madoff by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On June 23, 2023, pursuant to 28 U.S.C. § 1781, the Trustee filed three Motions for the Issuance of Letters of Request for International Judicial Assistance to the judicial authorities of Singapore for the examinations of Tong Foo Cheong, Daniel Chan Choong Seng, and Peter Michael Heng (collectively the “Motions”) (ECF Nos. 142-144).

2. Following the filing of the Motions, the Defendant and Trustee (collectively the “Parties”) have met and conferred regarding the content and scope of the proposed Letters of Request. The Parties have worked together in good faith and have reached an agreement on revised language for the proposed Letters of Request for Tong Foo Cheong, Daniel Chan Choong Seng, and Peter Michael Heng.

3. Defendant reserves all rights, arguments, objections, and defenses it may have regarding the Letters of Request for the examinations of Tong Foo Cheong, Daniel Chan Choong Seng, and Peter Michael Heng before a court in Singapore.

4. The deadline to file objections to the Motions expired on August 25, 2023. A hearing on the Motions has been scheduled for September 20, 2023, at 9:00 a.m.

5. Notice of the Motions was timely provided by email and Federal Express to the Defendant in the adversary proceeding and all parties that have filed a notice of appearance in this case, pursuant to the Order Establishing Notice Procedures (Adv. Pro. No. 08-01789 (CGM), ECF No. 4560).

6. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, or responsive pleading with respect to the Motions appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motions.

7. Electronic copies of the proposed orders ("Orders"), that are substantially in the form of the proposed orders that were annexed to the Motions will be submitted to the Court, along with this certificate.

8. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Orders be entered without a hearing.

Date: August 29, 2023
New York, New York

By: /s/ Robertson D. Beckerlegge
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